

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
vs.	)	No. S1-4:18-CR-00840-1-JAR-NAB
	)	
JOHNZELL MOOREHEAD,	)	
	)	
Defendant.	)	

**MOTION TO CONTINUE**

Now comes the defendant through appointed counsel, Daniel R. Schattnik, and hereby seeks to continue both the Sentencing herein and the time for the filing of objections to the PSR, and in support thereof states:

1. The undersigned counsel has been appointed as CJA counsel in three pending Federal Death Penalty eligible murder cases here within the Eastern District of Missouri, in addition approximately 14 other CJA cases, as well as his private practice involving both criminal and civil litigation; said cases are significantly more complex and time-consuming than other federal criminal cases.

2. Counsel is going to be out of town for the rest of this week attending the annual Federal Death Penalty training session put on through the Administrative Offices of the United States Courts; while attendance is not mandatory, counsel who have even one death eligible case are urged to attend this training.

3. Defendant is currently being housed in the Macoupin County Jail, located in Carlinville, Illinois, a significant distance from the Eastern District of Missouri (the US Marshall has run out of space on the Missouri side of the river for federal detainees).

4. That as such, counsel has not yet been able to meet and confer with the client in this matter regarding potential objections to the PSR do his obligations in the capital cases.

5. That there are additional other matters which need to be completed before this matter will be properly ready for sentencing.

6. The United States, per AUSA Tom Rea, has no objection to the granting of this motion.

Wherefore, counsel prays that the Sentencing herein be continued for approximately 60 days, and that the time for filing objections to the PSR be extended a similar period of time.

Respectfully submitted,

By: /S/ Daniel R. Schattnik  
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**CERTIFICATE OF SERVICE**

I certify that on the 12<sup>th</sup> of November, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon all counsel of record.

/S/ Daniel R. Schattnik  
Daniel R. Schattnik, #03122234 IL